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COUNSEL/PARTIES OF RECORD		
JAN 9, 2024		
CLERK US DISTRICT COURT		DEPUTY
BY:		

8 MILAN CHATTERJEE, ESQ.
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 12 3172 N. Rainbow Blvd, #1406
 13 Las Vegas, NV 89108
 14 Telephone: (702) 381-2875
 15 *Attorneys for Lynn Thompson*

16 **UNITED STATES DISTRICT COURT**
 17 **DISTRICT OF NEVADA**

18 LYNN THOMPSON, Plaintiff,
 19 vs.
 20 TESLA MOTORS, INC; ONQGLOBAL,
 21 INC.; DOES 1-15, Defendants.

22 **CASE NO.: 3:21-cv-00238-HDM-CSD**

23 **ORDER GRANTING STIPULATION AND**
ORDER TO EXTEND DISPOSITIVE
MOTION DEADLINE

24 **(Third Request)**

25 Plaintiff LYNN THOMPSON, by and through his attorneys of record Milan Chatterjee,
 26 Esq. and Kathleen Bliss, Esq., Defendant TESLA MOTORS, INC., by and through its attorney of
 27 record Joshua Sliker, Esq., and Defendant ONQGLOBAL, INC., by and through its attorney of
 28 record Wade Beavers, Esq., stipulate to extending the current deadline for dispositive motions
 from January 12, 2024 to **January 23, 2024**, due to the scheduling of a Settlement Conference for
 January 16, 2024. This stipulation is based on LR IA 6-1 and LR 26-3.

1 Pursuant to LR IA 6-1, the parties recite that this is the third stipulation to extend the
2 dispositive motion deadline in this case. The current January 12, 2024 dispositive motion
3 deadline was set by order dated September 1, 2023 (*see* ECF No. 113) following substitution of
4 Plaintiff's counsel in this matter. Subsequent thereto, the Court scheduled a mandatory settlement
5 conference in this case to occur January 16, 2024. *See* ECF No. 119 (Court's December 6, 2023
6 *Order Scheduling Video Settlement Conference*).

7 Pursuant to LR 26-3, the parties submit that good cause exists to continue the dispositive
8 motions deadline for a limited eleven (11) day period so that the parties may conserve resources
9 and expenses and focus energy on preparing for the January 16, 2024 mandatory settlement
10 conference. The current dispositive motion deadline falls four (4) days before the settlement
11 conference. The parties are asking that the new deadline fall seven (7) after the settlement
12 conference. In the event this matter is resolved at the conference, the need for dispositive motions
13 would be obviated and the parties would be saved the associated expense.

14 The parties are mindful of the existing trial date in this matter of May 21, 2024 (*see* ECF
15 No. 115 Minute Order setting trial), however they do not believe that the limited extension sought
16 herein will interfere with the parties' ability to complete full briefing of dispositive motions and
17 submit the same to the Court for decision well before the April 17, 2024 calendar call in this
18 matter (*see id.*).

19 Based on the foregoing, the parties respectfully submit that good cause exists to grant the
20 requested limited extension and continue the deadline for dispositive motions from January 12,
21 2024 to **January 23, 2024**.

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1 **IT IS SO STIPULATED.**

2 Dated this 8th day of January, 2024.

Dated this 8th day of January, 2024.

3 **MILAN'S LEGAL**

5 */s/ Milan Chatterjee, Esq.*
6 **MILAN CHATTERJEE, ESQ.**
7 Nevada Bar No. 15159
8 3172 N. Rainbow Blvd., 1406
9 Las Vegas, NV 89108
Tel: (702) 381-2875
Email: Milan@MilansLegal.com
Attorney for Lynn Thompson

5 */s/ Wade Beavers, Esq.*
6 **WADE BEAVERS, ESQ.**
7 Nevada Bar No. 13451
8 7800 Rancharrah Parkway
Reno, NV 89511
Tel: (775) 788-2208
Email: WBeavers@fennemorelaw.com
Attorney for OnQGlobal, Inc.

10 Dated this 8th day of January, 2024.

11 **JACKSON LEWIS, P.C.**

14 */s/ Joshua A. Sliker, Esq.*
15 **JOSHUA A. SLIKER, ESQ.**
16 Nevada Bar No. 12493
17 300 S. Fourth Street
Suite 900
18 Las Vegas, NV 89101
Tel: (702) 921-2460
Email: Joshua.Sliker@jacksonlewis.com
Attorney for Tesla Motors, Inc.

19 **ORDER**

20 Good cause appearing,

21 IT IS SO ORDERED.

22 DATED this 9th day of January, 2023.

23
24
25
26 
27 UNITED STATES MAGISTRATE JUDGE
28

Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.
Date: Monday, January 8, 2024 at 6:19:40 PM Pacific Standard Time
From: Sliker, Joshua A. (Las Vegas)
To: Beavers, Wade, Milan Chatterjee
CC: Pierce, Shannon, Kathleen Bliss
Attachments: image005.png, image006.png, image331647.png

These additions are fine with me.



Joshua A. Sliker (He/Him)

Attorney at Law

Jackson Lewis P.C.

300 S. Fourth Street

Suite 900

Las Vegas, NV 89101

Direct: (702) 921-2486 | Main: (702) 921-2460

Joshua.Sliker@Jacksonlewis.com | www.jacksonlewis.com

From: Beavers, Wade <WBeavers@fennemorelaw.com>

Sent: Monday, January 8, 2024 6:01 PM

To: Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Milan Chatterjee <milan@milanslegal.com>

Cc: Pierce, Shannon <SPierce@fennemorelaw.com>; Kathleen Bliss <kb@kathleenblisslaw.com>

Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Thanks, Milan. I think the Court will want us to include the form language set forth in LR IA 6-1 as well as a short paragraph detailing why the settlement conference creates "good cause" for the alteration of the deadline as required in LR 26-3. See my requested revisions in the attached.

Wade

Wade Beavers, Director
T: 775.788.2208 | F: 775.788.2283
wbeavers@fennemorelaw.com

From: Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>

Sent: Monday, January 8, 2024 5:49 PM

To: Milan Chatterjee <milan@milanslegal.com>; Beavers, Wade <WBeavers@fennemorelaw.com>

Cc: Pierce, Shannon <SPierce@fennemorelaw.com>; Kathleen Bliss <kb@kathleenblisslaw.com>

Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Hi Milan,

You have permission to affix my e-signature to the stipulation.

Thanks.

Josh



Joshua A. Sliker (He/Him)

Attorney at Law

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Joshua.Sliker@Jacksonlewis.com | www.jacksonlewis.com

From: Milan Chatterjee <milan@milanslegal.com>

Sent: Monday, January 8, 2024 5:30 PM

To: Beavers, Wade <WBeavers@fennemorelaw.com>

Cc: Pierce, Shannon <SPierce@fennemorelaw.com>; Sliker, Joshua A. (Las Vegas)

<Joshua.Sliker@Jacksonlewis.com>; Kathleen Bliss <kb@kathleenblisslaw.com>

Subject: Re: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Please see the attached Stipulation and Order. Please let us know if we can use your signature and file. Thanks.

Best regards,
Milan Chatterjee, Esq.
Founder & Managing Member



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From: Beavers, Wade <WBeavers@fennemorelaw.com>
Date: Monday, January 8, 2024 at 1:48 PM
To: Milan Chatterjee <milan@milanslegal.com>
Cc: Pierce, Shannon <SPierce@fennemorelaw.com>, Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@jacksonlewis.com>, Kathleen Bliss <kb@kathleenblisslaw.com>
Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Milan,

Let us know if we should expect to look for a draft stipulation from your office in relation to the dispositive motion deadline.

Sincere thanks,

Wade

From: Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>
Sent: Friday, January 5, 2024 11:57 PM
To: Kathleen Bliss <kb@kathleenblisslaw.com>; Beavers, Wade <WBeavers@fennemorelaw.com>
Cc: Milan Chatterjee <milan@milanslegal.com>; Pierce, Shannon <SPierce@fennemorelaw.com>
Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Tesla agrees to the extension as well.



Joshua A. Sliker (He/Him)
Attorney at Law

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From: Kathleen Bliss <kb@kathleenblisslaw.com>
Sent: Friday, January 5, 2024 8:05 AM
To: Beavers, Wade <WBeavers@fennemorelaw.com>
Cc: Milan Chatterjee <milan@milanslegal.com>; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Pierce, Shannon <SPierce@fennemorelaw.com>
Subject: Re: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Thanks, Wade.
Sent from my iPhone

On Jan 5, 2024, at 7:45 AM, Beavers, Wade <WBeavers@fennemorelaw.com> wrote:

Wade Beavers, Director
T: 775.788.2208 | F: 775.788.2283
wbeavers@fennemorelaw.com

Milan,

For OnQ, we would stipulate to the extension you propose below.

Wade

Wade Beavers
Director

[<0.png>](#)

7800 Rancharraah Pkwy, Reno, NV 89511
T: 775.788.2208 | F: 775.788.2283
wbeavers@fennemorelaw.com | [View Bio](#)
[<1.png><2.png><4.png>](#) [<3.png>](#)

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From: Milan Chatterjee <milan@milanslegal.com>
Sent: Tuesday, January 2, 2024 11:34 AM
To: Joshua.Sliker@jacksonlewis.com; Beavers, Wade <WBeavers@fennemorelaw.com>; Pierce, Shannon <SPierce@fennemorelaw.com>
Cc: Kathleen Bliss <kb@kathleenblisslaw.com>
Subject: Dispositive Motions Deadline - Thompson v. Tesla, et al.
Importance: High

Dear Counsel,

As you know, the Court has ordered a settlement conference for 1/16. Our dispositive motions are due 1/12.

In light that we now need to prepare for the settlement conference, I wanted to see if you're willing to stipulate to extending the dispositive motions deadline to 1/23.

Please advise.

Best regards,
Milan Chatterjee, Esq.
Founder & Managing Member

[<image001.png>](#)

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